
IN THE UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT

RYAN DILLON-CAPPS

Plaintiff-Appellant,

vs.

OHANA GROWTH PARTNERS, LLC *et al*

Defendants-Appellees.

No. **25-1162**

On Appeal from the U.S. District
Court Northern District of Maryland
No. 1:24-CV-3744-BAH

INFORMAL BRIEF: APPENDIX H – EQUITABLE RELIEF

In District ECF 1-0, at 26-29, The Prayer for Relief requests that the District Court determine the appropriate scope of equitable relief after the presentation of oral argument and testimonial evidence, allowing for a full development of both the legal and factual issues. Ryan Dillon-Capps acknowledges how this section could have contributed to the District Court’s misunderstanding. To clarify, *Complaint Integrated Appendix: Counts* (District ECF 1-7) provides the counts and relief aligning each request with the causes of action asserted therein and does not seek any relief from a defendant who is entitled to immunity from such relief.

In District ECF 18-0, at 13-14, The District Court quote from District ECF 1-0, at 29, omits the context, and misrepresents the argument which is about the failure of state actors to stop civil rights violations and their participation in a conspiracy to interfere with civil rights—both of which are asserted as counts in the complaint. The failure of these individual defendants resulted in months of

additional civil rights violations, and it says “all monetary relief [from] everyone else [not the State of Maryland]” in the District Court’s quoted citation. This is part of a broader argument concerning what constitutes equitable relief, framed around the compounding harm caused by consecutive and ongoing constitutional violations.

The next point argued that relief should not be deemed “too high” merely because it is substantial. Acknowledging that courts may reduce relief against private defendants based on their limited financial capacity, and challenged a conclusion that relief against them would be deemed “too high” while the presence and conduct of state actors is responsible for the scope of harm—and therefore the scale of appropriate relief—should expanded significantly due to the state actors’ involvement.

RESPECTFULLY SUBMITTED

April 16, 2025

/s/ Ryan Dillon-Capps
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